

### **REMARKS**

In the June 24, 2004 Office Action, the Examiner rejected claims 1-32 pending in the application. Upon entry of the foregoing amendments, Applicants amend claims 1, 2, 8, 13, 14, 20, 28, 30, and 32, and cancel claims 27, 29, and 31, without conceding the associated rejections and without prejudice to the filing of one or more related applications containing the claimed subject matter. Support for the amended claims may be found in the originally filed specification, and thus, no new matter is added by this amendment. Upon entry of the foregoing amendments, claims 1-26, 28, 30, and 32 (4 independent claims; 29 total claims) remain pending in the application. Applicants request reconsideration in view of the above amendments and the following remarks.

### **TELEPHONIC INTERVIEW**

In the telephone interview of August 18, 2004, Examiner Jonathan Ouellette and the Applicants' representative (David O. Caplan) discussed the Office Action of June 24, 2004, the cited references from the Office Action, and proposed amendments to the claims. During the interview, it was agreed that it was likely that the proposed amendments to the claims would overcome the references cited in the June 24, 2004 Office Action. With reference to the Examiner's Interview Summary of August 18, 2004, the Examiner states "Mr. Caplan discussed adding fully automated language to the independent claims and Examiner Ouellette agreed that the amendment would most likely overcome the cited prior art by changing the scope of the claims. Examiner Ouellette also indicated that such a change would require additional search and examination of the application, to include further detailed searching of the cited prior art."

### **CLAIM REJECTIONS FROM OFFICE ACTION**

#### **35 U.S.C. §103**

Claims 1-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Lauffer, U.S. Patent No. 6,223,165, issued April 24, 2001 (hereinafter "Lauffer") in view

of Taufique (WO 01/20518 A1). Applicants respectfully traverse this rejection and provide the following arguments in support.

Lauffer is limited to a system for delivering advice to consumers by including a server unit that stores and displays the names and characteristics of experts and then assists in connecting the expert and consumer for real-time communication. The server unit also has the ability to receive keywords from the consumer, match those keywords to one or more experts, and then tell the consumer how to contact an expert. Lauffer teaches a visual display of available experts that may be presented to consumers (col. 6, line 30 - col. 7, line 67). In addition, Lauffer teaches having the consumer compensate the expert, either directly or indirectly (col. 8, lines 1-53). In all embodiments disclosed by Lauffer, the consumer and expert establish a connection wherein the consumer and expert communicate interactively with each other (e.g., see col. 8, line 56 - col. 9, line 22). However, Lauffer does not teach or suggest, *inter alia*, "automatically retrieving from the answer database, without intervention by the destination expert, an answer to the customer request".

Taufique is limited to a system and method for providing communications between an expert and an end user seeking a solution to an end user request. In response to the end user request, the expert transmits an expert answer to the end user. The system provides for a database for storing information relating to a plurality of experts and for storing the transmitted expert answer. However, Taufique does not teach or suggest "automatically retrieving from the answer database, without intervention by the destination expert, an answer to the customer request".

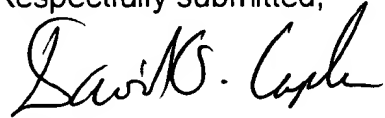
As discussed with the Examiner, claims 1-26, 28, 30, and 32 are not rendered obvious by Lauffer in view of Taufique, because neither Lauffer nor Taufique teach or suggest "**automatically** retrieving from an answer database, **without intervention by the destination expert**, an answer to the customer request, such that the destination expert response includes the retrieved answer" (emphasis added) as set forth in amended independent claims 1, 8, 13, and 20. For example, when the customer request is received, an answer is automatically retrieved from the answer database and the retrieved answer is included with the expert's response to the customer request.

In fact, the combination of Lauffer and Taufique teach away from the presently claimed invention by providing for a system that has the consumer and expert set up an interactive communication connection, whereby the expert answers the consumer's questions in an interactive fashion and an answer is not automatically retrieved from an answer database. Accordingly, the combination of Lauffer and Taufique does not render amended independent claims 1, 8, 13 and 20 obvious. As discussed with the Examiner during the telephone interview of August 18, 2004, the proposed amendments to independent claims 1, 8, 13, and 20 overcome the rejection of the pending claims as being unpatentable over Lauffer in view of Taufique. Applicants therefore respectfully request that the Examiner reconsider and withdraw the Section 103 rejection with respect to claims 1-26, 28, 30, and 32 (claims 2-7, 9-12, 14-19, and 21-26 each variously depend from independent claims 1, 8, 13 and 20). Claims 27, 29 and 31 have been cancelled by Applicants, and thus, the Examiner's rejection is moot with respect to such claims.

**CONCLUSION**

In view of the foregoing, Applicants respectfully submit that all of the pending claims fully comply with 35 U.S.C. § 112 and are allowable over the prior art of record. Reconsideration of the application and allowance of all pending claims is earnestly solicited. Should the Examiner wish to discuss any of the above in greater detail, then the Examiner is invited to contact the undersigned at the Examiner's convenience.

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